

EXHIBIT A

From: Celine Purcell
Sent: Monday, January 29, 2024 5:54 PM
To: Reid Gaa; Vigen, Leslie (CIV); Adam Polk; Trevor T. Tan; Simon S. Grille; Anthony (Tony) Rogari; Anne-Michele Von Goetz
Cc: Fred Norton; Bree Hann; Nathan Walker; Josephine Petrick; Gil Walton; Emily Kirk; Diana Abad
Subject: RE: Stark et al. v. Patreon – Stip. Re Class Cert. Briefing Schedule

Good Evening Reid,

Thank you for your email. Before stipulating to or opposing plaintiffs' request for a 90 day extension of the class certification opening brief deadline, Patreon would like to see what, if anything, comes from (1) the Meta deposition (which Judge Spero ordered to be taken on or before February 15) and (2) the on-going meet and confer between plaintiffs and Meta (deadline to file additional briefing, if necessary, is this coming Monday February 5). It is premature for us to take a position one way or another on an extension while these discovery items are in the air and when their outcomes very well may not necessitate an extension, or if they do, may not necessitate the full 90 days.

Patreon proposes the parties connect shortly after the Meta deposition to discuss your proposed extension. By that time, presumably, the other outstanding issues with Meta will be closer to resolution (if not resolved entirely).

Best,

Celine

Celine G. Purcell
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From: Reid Gaa <rgaa@girardsharp.com>
Sent: Friday, January 26, 2024 3:49 PM
To: Celine Purcell <cpurcell@nortonlaw.com>; Vigen, Leslie (CIV) <leslie.vigen@usdoj.gov>; Adam Polk <apolk@girardsharp.com>; Trevor T. Tan <ttan@girardsharp.com>; Simon S. Grille <sgrille@girardsharp.com>; Anthony

(Tony) Rogari <arogari@girardsharp.com>; Anne-Michele Von Goetz <avongoetz@girardsharp.com>
Cc: Fred Norton <fnorton@nortonlaw.com>; Bree Hann <bhann@nortonlaw.com>; Nathan Walker
<nwalker@nortonlaw.com>; Josephine Petrick <jpetrick@nortonlaw.com>; Gil Walton <gwalton@nortonlaw.com>;
Emily Kirk <ekirk@nortonlaw.com>; Diana Abad <dabad@nortonlaw.com>
Subject: RE: Stark et al. v. Patreon – Stip. Re Class Cert. Briefing Schedule

You don't often get email from rgaa@girardsharp.com. [Learn why this is important](#)

Celine,

Thank you for your email. Given the Court's ruling today on Plaintiffs' motion to compel directed at the Meta subpoena and other ongoing discovery, Plaintiffs intend to seek an order from the Court extending Plaintiffs' deadline to file their motion for class certification. We request that Patreon consent to a minimum 90-day extension. We reserve the right to apply for a greater extension should Patreon decline. Please let us know Patreon's position.

Thank you,
Reid

Reid Gaa

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From: Celine Purcell <cpurcell@nortonlaw.com>

Sent: Wednesday, January 24, 2024 8:42 AM

To: Vigen, Leslie (CIV) <leslie.vigen@usdoj.gov>; Adam Polk <apolk@girardsharp.com>; Kimberly Macey <kmacey@girardsharp.com>; Reid Gaa <rgaa@girardsharp.com>; Trevor T. Tan <ttan@girardsharp.com>; Simon S. Grille <sgrille@girardsharp.com>; Anthony (Tony) Rogari <arogari@girardsharp.com>; Anne-Michele Von Goetz <avongoetz@girardsharp.com>

Cc: Fred Norton <fnorton@nortonlaw.com>; Bree Hann <bhann@nortonlaw.com>; Nathan Walker <nwalker@nortonlaw.com>; Josephine Petrick <jpetrick@nortonlaw.com>; Gil Walton <gwalton@nortonlaw.com>; Emily Kirk <ekirk@nortonlaw.com>; Diana Abad <dabad@nortonlaw.com>

Subject: RE: Stark et al. v. Patreon – Stip. Re Class Cert. Briefing Schedule

EXTERNAL EMAIL

Good Morning, Counsel,

Following up on my email below regarding the schedule for class certification briefing.
I've reattached the draft stipulation for your convenience.
If you approve, we will file it promptly.

Celine

From: Celine Purcell

Sent: Thursday, January 18, 2024 9:56 PM

To: Vigen, Leslie (CIV) <leslie.vigen@usdoj.gov>; Adam Polk <apolk@girardsharp.com>; Kimberly Macey <kmacey@girardsharp.com>; Reid Gaa <rgaa@girardsharp.com>; ttan@girardsharp.com; Simon S. Grille <sgrille@girardsharp.com>; Anthony (Tony) Rogari <arogari@girardsharp.com>; 'avongoetz@girardsharp.com'

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Subject: FW: Stark et al. v. Patreon – Stip. Re Class Cert. Briefing Schedule

Evening Counsel – sending this again to loop in Leslie.

From: Celine Purcell

Sent: Thursday, January 18, 2024 2:43 PM

To: Adam Polk <apolk@girardsharp.com>; Kimberly Macey <kmacey@girardsharp.com>; Reid Gaa <rgaa@girardsharp.com>; ttan@girardsharp.com; Simon S. Grille <sgrille@girardsharp.com>; Anthony (Tony) Rogari <arogari@girardsharp.com>; avongoetz@girardsharp.com

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Subject: Stark et al. v. Patreon – Stip. Re Class Cert. Briefing Schedule

Good Afternoon, Counsel,

Attached please find a draft stipulation regarding class certification briefing.

As you know, Judge Spero previously ordered us to submit a joint briefing schedule within 5 days after you submit your opening brief.

Given how busy the case is, we thought it wise to have clarity regarding the schedule now instead of waiting until your opening brief is filed.

Please let us know if you have any edits to the attached.

If you approve, we are happy to get it on file.

Best,

Celine

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9 Attorneys for Defendant
PATREON, INC.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13
14

15 BRAYDEN STARK and JUDD OOSTYEN,
on behalf of themselves and all others
16 similarly situated,

17 Plaintiffs,

18 v.

19 PATREON, INC.,

20 Defendant.

Case No. 3:22-cv-03131-JCS

**STIPULATION REGARDING BRIEFING
SCHEDULE AND HEARING DATE FOR
CLASS CERTIFICATION**

Plaintiffs Brayden Stark and Judd Oostyen, individually and on behalf of all other similarly situated, (“Plaintiffs”) and Defendant Patreon, Inc. hereby stipulate and agree as follows:

The Court previously ordered Plaintiffs to file their motion for class certification no later than March 15, 2024. Dkt. Nos. 65 and 67. The parties further stipulated, and the Court so ordered, that within 5 days of the filing of Plaintiffs’ class certification motion the parties would stipulate to a briefing schedule for the class certification opposition, reply, and hearing date. Dkt. No. 67 at 1. Rather than wait for the opening brief to be filed, and to provide the parties clarity on upcoming deadlines, the parties have stipulated to the following briefing schedule:

Event	Deadline
Class Certification Opening Brief	March 15, 2024
Opposition to Class Certification	April 25, 2024
Reply Brief	May 9, 2024
Hearing Date	June 7, 2024

Further, to the extent a party relies on an expert in support of their class certification motion or opposition thereto, the party must disclose that expert and the topic(s) on which the expert will testify at least 3 weeks before the party’s brief is due.

Additionally, if an expert relies upon materials not previously produced in the litigation, all such materials must be filed concurrently with the party’s brief. For example, if Plaintiffs’ expert relies upon material not previously produced, those materials must be produced on March 15, 2024 – the same day Plaintiffs file their opening brief. This stipulation shall not relieve any party of the obligation to timely produce documents and information that have previously been sought in discovery.

Any expert reports or declarations filed in support of a brief must comply with Federal Rule of Civil Procedure 26(a)(2)(B).

Finally, if a party relies on an expert in support of their class certification motion or opposition, the party must make their expert available for deposition within three weeks after the party’s brief is

1 filed. For example, if Plaintiffs rely on an expert, they must make that expert available for deposition
2 between March 15 and April 5, 2024.

3
4 IT IS SO STIPULATED.

5
6 Dated: February 7, 2024

Respectfully submitted,

7
8 THE NORTON LAW FIRM PC

9 DRAFT

10 NAME

11 Attorneys for Defendant
12 PATREON, INC.

13
14 Dated: February 7, 2024

[FIRM NAME]

15
16 DRAFT

NAME

17 Attorneys for Plaintiffs
18 BRAYDEN STARK and
19 JUDD OOSTYEN
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ATTESTATION

Pursuant to Local Rule 5-1(h)(3), I hereby attest that I obtained concurrence in the filing of this document from each of the other signatories on this e-filed document.

Dated: January XX, 2023

Respectfully submitted,

/s/ DRAFT

Fred Norton

THE NORTON LAW FIRM PC

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

HON. JOSEPH C. SPERO
UNITED STATES DISTRICT JUDGE